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UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA  
WESTERN DIVISION

MEGA DISTRIBUTION INT'L INC.,  
a California Corporation

Plaintiff,

vs.

LEDEQUIPPED.COM CORP., a New  
York Corporation;  
Defendant.

Case No. 2:15-cv-8579

**COMPLAINT FOR INFRINGEMENT  
OF UNITED STATES PATENT  
NOS. D614,063; D618,572; D627,672; and  
D617,229.**

**DEMAND FOR JURY TRIAL**

1. Plaintiff Mega Distribution Int'l, Inc., a California corporation ("Mega"), for its complaint, and demanding trial by jury under Rule 38, Fed. R. Civ. P., and Local Rule 38-1, alleges that LEDEQUIPPED.COM Corp. ("Defendant"), a New York corporation, is infringing U.S. Design Patent D614,063 ("the '063 patent"), U.S. Design Patent D618,572 ("the '572 patent"), U.S. Design Patent D627,672; and U.S. Design Patent D617,229 (collectively, "the Mega patents"), by making, selling, and offering to sell, in this judicial district, lightbars that infringe the Mega patents.

2. This is a civil action for patent infringement and arises under, among other things, the United States Patent Laws, 35 U. S. C. section 10, et seq.

1 Jurisdiction is therefore based upon 28 U. S. C. sections 1331 and 1338(a),  
2 providing for federal question jurisdiction of patent infringement actions and  
3 exclusive jurisdiction of patent infringement actions in the U. S. district courts.

4 3. Plaintiff Mega is informed and believes, and thereon alleges, that venue  
5 in this court is proper under 28 U. S. C. section 1391 (c) and section 1400 (b)  
6 because the acts of patent infringement alleged herein took place, at least in part,  
7 within this judicial district.

8 4. Plaintiff Mega is a California corporation, and has its principal place of  
9 business in Paramount, California.

10 5. Defendant is a New York corporation, and has a place of business in  
11 Great Neck, New York.

12 6. On April 20, 2010, the U. S. Patent and Trademark Office duly and  
13 lawfully issued the '063 patent under the title *Warning Light Lens*. A true and  
14 correct copy of the '063 patent is attached hereto as **Exhibit A**.

15 7. On June 29, 2010, the U.S. Patent and Trademark Office duly and  
16 lawfully issued the '572 patent under the title *Warning Light Lens*. A true and  
17 correct copy of the '572 patent is attached hereto as **Exhibit B**.

18 8. On November 23, 2010, the U.S. Patent and Trademark Office duly and  
19 lawfully issued the '672 patent under the title *Warning Light Lens*. A true and  
20 correct copy of the '672 patent is attached hereto as **Exhibit C**.

21 9. On June 8, 2010, the U.S. Patent and Trademark Office duly and  
22 lawfully issued the '229 patent under the title *Mirrored Light Bar Set For*  
23 *Emergency Vehicles*. A true and correct copy of the '229 patent is attached as  
24 **Exhibit D**.

25 8. At least since 2013, Defendant has infringed the '063 and '229 patents  
26 by selling, and offering to sell, in this judicial district and elsewhere in the United  
27 States, light bars with warning light lenses covered by the single claim of the '063  
28 and '229 patents. Defendant's offers to sell and sale, in this judicial district, of

1 Lights Bars, specifically model Black-Hawk 3 Interior Visor Led TIR Light bars,  
2 have infringed the '063 and '229 patents.

3 Defendant has infringed the '572 patent by selling, and offering to sell, in this  
4 judicial district and elsewhere in the United States, light bars with warning lights  
5 lenses covered by the single claim of the '572 patent. Defendant's offer to sell and  
6 sale, in this judicial district, of Black-Hawk 4 Interior Visor Led TIR Light Bars;  
7 Condor Emergency LED TIR Light bars 23in; Condor Emergency LED TIR Light  
8 Bar 40in; Condor Emergency LED TIR Light bars 48in; Condor Emergency LED  
9 TIR Light bars 60in; Falcon Flight Emergency LED Light Bars 18in; Falcon Flight  
10 Emergency LED Light Bar 27in; Falcon Flight Emergency LED Light Bar 37in;  
11 Falcon Flight Emergency LED Light bar 60in; Falcon Flight Emergency LED TIR  
12 Light Bar 48in; Falcon Flight Extreme Emergency LED Light Bar 18in; Falcon  
13 Flight Extreme Emergency LED Light Bar 27in; Falcon Flight Extreme Emergency  
14 LED Light Bar 37in; Falcon Flight Extreme Emergency LED Light Bar 48in;  
15 Falcon Flight Extreme Emergency LED Light Bar 55in; Falcon Flight Extreme  
16 Emergency LED Light Bar 63in; and Condor and Falcon TIR Replacement module,  
17 have infringed the '572 patent.

18 Defendant has infringed the '672 patent by selling, and offering to sell, in this  
19 judicial district and elsewhere in the United States, light bars with warning light  
20 lenses covered by the single claim of the '672 patent. Defendant's offer to sell and  
21 sale, in this judicial district, of Condor Emergency LED Linear Light bar 40in;  
22 Condor Emergency LED Linear Light bar 48in; Condor Emergency LED Linear  
23 Light bar 60 in; Condor Linear emergency led lightbar 23in; Falcon Flight Extreme  
24 Linear Emergency LED Light Bar 18in; Falcon Flight Extreme Linear Emergency  
25 LED Light Bar 27in; Falcon Flight Extreme Linear Emergency LED Light Bar 37in;  
26 Falcon Flight Extreme Linear Emergency LED Light Bar 48in; Falcon Flight  
27 Extreme Emergency LED Light Bar 55in; Falcon Flight Extreme Linear Emergency  
28 LED Light Bar 63in; Hunter Interior Visor Linear LED Emergency Vehicle Light

1 Bar; and Condor and Falcon linear replace modules, have infringed the '672 patent.  
2 Images and a spreadsheet of Defendant's infringing products are attached hereto as  
3 **Exhibit E.**

4 8. Upon information and belief, Defendant's infringement has taken place  
5 with full knowledge of the Mega patents and has been intentional, deliberate, and  
6 willful.

7 9. Upon information and belief, Defendant has derived, and will continue  
8 to derive, and received from the above infringement, gains, profits, and advantages  
9 in an amount not presently known to Mega.

10 10. Defendant's infringement of the Mega patents has damaged Mega in an  
11 unknown amount. These damages continue to grow as Defendant's infringement  
12 continues. Under Section 284 of Title 35 of the United States Code, Mega seeks  
13 damages adequate to compensate for this infringement in an amount not less than  
14 Defendant's total profit from sales of the infringing products, together with interest  
15 and costs affixed by the Court. Under Section 289 of Title 35 of the United States  
16 Code, Mega also seeks its lost profit.

17 11. Defendant's continuing infringement of the Mega patents has caused  
18 and continues to cause irreparable harm to Mega, including impairing the value of  
19 the Mega patents in an amount yet to be determined. Pursuant to Section 283 of  
20 Title 35 of the United States Code, Mega seeks a preliminary and a permanent  
21 injunction against further infringement of the Mega patents.

22 **PRAYER FOR RELIEF**

23  
24 WHEREFORE, Mega prays for the following relief from this court against  
25 Defendant:

26 1. An order, pursuant to 35 U.S.C. Section 271, declaring that Defendant  
27 has infringed the single claim of the '063 patent; the single claim of the '572 patent;  
28 the single claim of the '672 patent; and the single claim of the '229 patent;

1           2.     A preliminary and a permanent injunction against Defendant,  
2 prohibiting Defendant from further infringement of the Mega patents;

3           3.     An award of the actual damages Mega has suffered by reason of the  
4 infringement charged in this Complaint, in an amount not less than the total profits  
5 from Defendant's sales of the products charged with infringing the Mega patents;

6           4.     An award to Plaintiff Mega of its costs of suit herein; and

7           5.     Such other and further relief as the Court may deem just and proper.  
8

9 Dated: November \_\_, 2015

Respectfully submitted,

10 WAGNER, ANDERSON & BRIGHT PC  
11

12 By: \_\_\_\_\_

13                   Patrick F. Bright  
14                   Attorneys for Plaintiff Mega Distribution  
15                   Int'l Inc.  
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**DEMAND FOR JURY TRIAL**

Pursuant to Rule 38(b) of the Federal Rules of Civil Procedure, and Local Rule 38-1, Plaintiff Mega does hereby demand trial by jury of each and every issue and claim as to which it is entitled to trial by jury under Rule 38(a) of the Federal Rules of Civil Procedure.

Dated: November 3, 2015

Respectfully submitted,

WAGNER, ANDERSON & BRIGHT PC

By: Patrick F. Bright  
Patrick F. Bright  
Attorneys for Plaintiff Mega Distribution  
Int'l Inc.